

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SKILLZ PLATFORM INC.,  
a Delaware corporation,

Plaintiff,

- against -

PAPAYA GAMING, LTD., a foreign corporation;  
and PAPAYA GAMING, INC., a Delaware  
corporation,

Defendants.

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PAPAYA GAMING, LTD.,

Counterclaim-Plaintiff,

- against -

SKILLZ PLATFORM INC.,

Counterclaim-Defendant,

and

TETHER STUDIOS LLC and GOLDEN WOOD  
COMPANY, LTD.,

Additional  
Counterclaim-Defendants.

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Case No. 1:24-cv-01646-DLC

**STIPULATION AND [PROPOSED]**  
**PROTECTIVE ORDER**

WHEREAS, Plaintiff/Counterclaim-Defendant Skillz Platform Inc. (“Skillz”) and Defendant/Counterclaim-Plaintiffs Papaya Gaming, Ltd. and Papaya Gaming, Inc. (“Papaya”) stipulated to a proposed protective order on June 27, 2024 (Dkt. 38) and the Court entered the protective order on June 28, 2024 (Dkt. 39);

WHEREAS, “Party” in that protective order is defined to mean only “Plaintiff Skillz Platform, Inc. and Defendants Papaya Gaming, Ltd. and Papaya Gaming, Inc., including all of their officers, directors and employees;”

WHEREAS, Tether Studies LLC (“Tether”) was named as an Additional Counterclaim Defendant in Papaya’s August 5, 2024 Counterclaim (Dkt. 23) and September 23, 2024 Amended Counterclaim (Dkt. 46);

WHEREAS, the parties anticipate that discovery in this matter will involve confidential, proprietary, and/or commercially or competitively sensitive information.

WHEREAS, Tether’s position is that Tether currently lacks access to sealed pleadings in this matter, as well as discovery exchanged between the principal parties, and that lack of access will prejudice Tether if continued.

WHEREAS, Tether’s position is that materials relevant to Papaya’s counterclaims may be subject to confidentiality restrictions, and it would be unduly burdensome to Tether to produce such materials without the benefit of a protective order.

**IT IS HEREBY STIPULATED THAT** subject to the Court’s approval, Tether shall be made a party to the protective order (Dkt. 39) and shall proceed with discovery subject to the rights and obligations imposed by that order and the Federal Rules of Civil Procedure.

*So ordered.*  
*Quinn C. [Signature]*  
*10/31/24*

Dated: October 30, 2024

Respectfully submitted,

/s/ Ethan M. Thomas

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Defendant Tether Studios LLC*

*[additional parties' signatures on following page]*

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Papaya Gaming, Inc.*

**SO ORDERED.**

Dated: \_\_\_\_\_, 2024

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HON. DENISE L. COTE  
UNITED STATES DISTRICT JUDGE